

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Plaintiff(s)

PAUL R. F. SCHUMACHER,

- *against* -

Defendant(s)

CAPITAL ADVANCE SOLUTIONS, LLC,
CHARLES BETTA AND DAN LOGAN

Case No. 4:18-cv-00436
(PGS)

**DEFENDANT CHARLES BETTA'S APPLICATION UNDER FEDERAL RULE OF
CIVIL PROCEDURE 6(b) TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD
IN RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant, Charles Betta, through his attorneys, Kent & McBride, P.C., moves before the Court pursuant to Federal Rule of Civil Procedure 6(b) to enlarge the time period within which the defendant may file an answer or other responsive pleading to Plaintiff's Complaint by fourteen (14) days. Defendant has not requested any prior extension of the time to answer or plead. In support of this application, the defendant avers the following:

1. Plaintiff's Complaint was served on Charles Betta on April 27, 2018.
2. The time for Defendant to answer or otherwise plead has not expired.
3. The Defendant recently retained Christopher D. Devanny, Esq. of the law office of Kent & McBride, P.C. to represent him in this litigation. A Motion and Order for Pro Hac Vice was filed with the Court on May 10, 2018. The Order was entered on May 16, 2018.
4. Defendant respectfully request a fourteen (14) day extension of the time within which he may answer or otherwise plead in response to Plaintiff's Complaint.

5. This request is made without waiving any applicable defenses, including, but not limited to, the defenses of improper service of process and failure to arbitrate.

WHEREFORE, Defendant, Charles Betta, respectfully requests the Clerk of the Court to extend his time to respond to Plaintiff's Complaint by fourteen (14) days.

Respectfully submitted,



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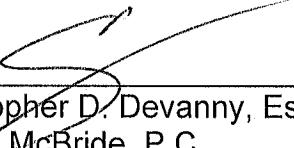
Dated: May 17, 2018

CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that on May 17, 2018, a true and exact copy of this Application under Federal Rule of Civil Procedure 6(b) to Extend Time to Answer or otherwise Plead in Response to Plaintiff's Complaint was served upon the following individuals through the Court's electronic filing system and the United States Mail:

Paul R. F. Schumacher, pro se
1512 Oakview Street
Bryan, TX 77802

KENT & MCBRIDE, P.C.


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Dated: May 17, 2018